

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

<b>In Re:</b>	)	
	)	
<b>CYRILLA, MICHAEL C.</b>	)	<b>Case No. <u>18-20017-GLT</u></b>
	)	<b>Adversary No. 20-02045GLT</b>
<b>Debtor,</b>	)	<b>Chapter 7</b>
	)	
<b>Paul M. Schreiber,</b>	)	<b>Doc. No.</b>
	)	
<b>Movant</b>	)	
	)	
<b>v.</b>	)	
<b>Rosemary C. Crawford, Trustee,</b>	)	
<b>Joseph and Pamela Eritano, and Rorus</b>	)	<b>Adversary Related to Doc. No. 33, 34</b>
<b>Revocable Living Trust, Alan Smith,</b>	)	
<b>Mark Costello, Michael Cyrilla,</b>	)	<b>Hearing Date: N/A</b>
	)	
<b>Respondents.</b>	)	

**THE TRUSTEE'S STATUS REPORT**

AND NOW, comes the Trustee, Rosemary C. Crawford, by and through her counsel, Crawford Mc Donald, LLC, and files this Objection to the Motion to Disqualify Bid and Include Lift, as follows:

1. The Debtor converted to Chapter 7 on or about August 26, 2019, and Rosemary C. Crawford was duly appointed and qualified as Trustee.
2. On or about May 28, 2020, an Order approving sale of real estate located at 519 Thorn Run Road, Moon Twp., PA (the "Property") to Paul Schreiber ("Mr. Schreiber") and Lora Schreiber, husband and wife, (the "Sale Order") was entered by the Court after a sale hearing.
3. Closing on the building occurred on July 1, 2020, with sums paid by Paul Schreiber, the successful bidder.
4. The Trustee visited the site on June 29, 2020 and June 30, 2020, to follow up on allegations made at the June 26, 2020 Hearing. On both dates, there were no

visible signs of business being conducted on the Property, and the property was secure at that time with new locks. See attached photos marked as **Exhibit “A”**.

5. The Trustee observed that the lift is bolted to the floor, however, there is no ditch or other apparatus as stated at the June 26, 2020 Hearing. It does not appear to be a fixture based on the law the Court cited at the June 26, 2020 Hearing. See attached photos marked as **Exhibit “B”**. With that said, the Trustee will file a follow-up motion requesting a \$7,200.00 credit to Mr. Schreiber in order to resolve his concerns, noting that ambiguity regarding the lift could result in continuing litigation costs, which could exceed the \$7,200 credit, particularly since he paid in good faith.
6. The Trustee observed that there is no substantial debris located at the Property as alleged at the June 26, 2020 Hearing. See attached photos marked as **Exhibit “C”**.

Respectfully submitted,

/s/ Rosemary C. Crawford

Rosemary C. Crawford, Esq., Trustee  
Crawford McDonald, LLC.

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Dated: July 1, 2020